

REMARKS

Reconsideration of the present application is respectfully requested. Claims 46, 54, 59, 67, 75 and 80 have been canceled (claims 1-42, 44, 45, 50, 61, 62, 65, 66, 71, 82 and 83 were previously canceled). No claims have been added in this response. Claims 43, 47, 48, 52, 57, 60, 64, 68, 69, 73, 78, 79 and 81 have been amended.

Claim Rejections

Independent claims 43, 52, 57, 64, 73, and 78 stand rejected under 35 U.S.C. § 103(a) based on Reed et al. (U.S. Patent no. 6,004,205), in view of Brunson et al. (U.S. Patent no. 6,018,762) and Frietas et al. (U.S. 2002/0049858). Applicants respectfully traverse the rejections.

One of the basic requirements of a *prima facie* case of obviousness is that the prior art reference (or references when combined) must teach or suggest all of the claim limitations. MPEP §2143.

Claim 43, as currently amended, recites:

43. A method for operating an electronic mail server system having mailboxes associated with wireless client devices, the method comprising:

receiving input to change a folder structure of a mailbox;

making a change to the folder structure of the mailbox in response to the input;

and

pushing a message to a wireless client device associated with the mailbox, the message comprising information about the folder structure change to the mailbox, wherein the information is used by the wireless client device to synchronize a cached version of the mailbox stored locally in the wireless client device with the mailbox prior to notifying a user of the folder structure change to the mailbox.

(Emphasis added).

By contrast, Reed, Brunson and Frietas, individually or in combination, do not teach the above emphasized claim limitations. Reed discloses an automated communications system

operating to transfer data, metadata and methods from a provider computer to a consumer computer through a communication network. Information which changes in the provider computer is automatically updated in the consumer computer through the communications system.

Reed does not teach or suggest receiving input to change a folder structure of a mailbox. The Examiner alleged that changing a database's content is to change the database's organizational structure (final office action mailed on 1/17/2007). Without admitting the propriety of the Examiner's allegation, Applicants amended the claim to change the language from "an organizational structure of a mailbox" to "a folder structure of a mailbox". Thus, even assuming *arguendo* that a content change of a database may be considered as an organizational structure change, the organizational structure change is not a folder structure change.

Reed further does not teach or suggest pushing a message to a wireless client device associated with the mailbox, the message comprising information about the folder structure change to the mailbox, wherein the information is used by the wireless client device to synchronize a cached version of the mailbox stored locally in the wireless client device with the mailbox prior to notifying a user of the folder structure change to the mailbox. The Examiner alleges that Reed teaches or suggests pushing a message to a wireless client device associated with the database, the message comprising information about the organizational change to the database, wherein the information is used by the wireless client device to synchronize a cached version of the database stored locally in the wireless client device with the database prior to notifying a user of the change to the database (office action mailed on 7/18/2006, page 3). However, as disclosed in Reed, information being pushed from a provider computer to consumer computers is changes in data stored in a provider database, not changes in a folder structure of

the provider database, much less changes in a folder structure of a mailbox (see Reed's column 9, lines 38-41). Thus, Reed also does not teach or suggest pushing a message to a wireless client device associated with the mailbox, the message comprising information about the folder structure change to the mailbox, wherein the information is used by the wireless client device to synchronize a cached version of the mailbox stored locally in the wireless client device with the mailbox prior to notifying a user of the folder structure change to the mailbox.

Brunson also does not teach or suggest the above discussed claim limitations. Brunson discloses "a way of synchronizing the contents of commonly-owned mailboxes in disparate messaging systems" (Brunson's Abstract). As disclosed in column 6, lines 1-20, it is the changes of the messages stored in a mailbox that are synchronized, not the folder structure changes of the mailbox that are synchronized, such as recited in claim 43. Thus, Brunson also does not teach or suggest the above emphasized limitations of claim 43.

Frietas also does not teach or suggest the above emphasized limitations. Neither does the Examiner contend so.

Thus, at least for the foregoing reasons, claim 43 is not obvious based on Reed in view of Brunson and Frietas. Independent claim 64 recites limitations similar to those discussed above for claim 43. Accordingly, claim 64 and all claims which depend on it are also patentable over Reed, Brunson and Frietas for similar reasons.

Independent claim 52, as currently amended, recites:

52. A method for operating a wireless client device, the method comprising:
receiving a pushed message;
determining whether the message is a mail notification; and
if the message is a mail notification, then
decoding the message to obtain message access protocol parameters;

connecting to a mail server and synchronizing a cached mailbox stored locally in the wireless client device with an associated mailbox stored in the mail server, wherein the synchronizing comprises using the message access protocol parameters to determine a change made to a folder structure of the associated mailbox, wherein the connecting and synchronizing are performed prior to notifying a user of the change; and

notifying the user of the wireless client device of the change.
(Emphasis added).

In contrast, Reed, Brunson and Frietas, individually or in combination, do not teach or suggest the above emphasized limitations of claim 52, namely, receiving a pushed message, decoding the message to obtain message access protocol parameters, and connecting to a mail server and synchronizing a cached mailbox stored locally in the wireless client device with an associated mailbox stored in the mail server, the synchronizing including using the message access protocol parameters to determine a change made to a folder structure of the associated mailbox. Claim 52 essentially recites the invention of claim 43 from the client side's perspective. Claim 52, however, includes the essential limitations of the invention as discussed above for claim 43. At least for the reasons discussed above for claim 43, claim 52 is also patentable over the cited references.

Independent claims 57, 73 and 78 each recites limitations similar to those discussed above for claim 52. For similar reasons, claims 57, 73, 78 and all claims which depend on them are also patentable over the cited references.

Dependent Claims

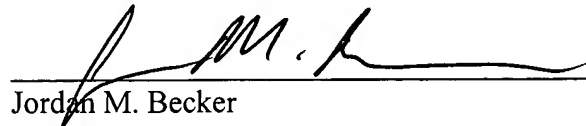
In view of the above remarks, a specific discussion of the dependent claims is considered to be unnecessary. Therefore, Applicants' silence regarding any dependent claim is not to be interpreted as agreement with, or acquiescence to, the rejection of such claim or as waiving any argument regarding that claim.

For the foregoing reasons, the present application is believed to be in condition for allowance, and such action is earnestly requested.

If any additional fee is required, please charge Deposit Account No. 02-2666.

Respectfully submitted,
BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: March 14, 2007



Jordan M. Becker
Reg. No. 39,602

Customer No. 48102
12400 Wilshire Boulevard
Seventh Floor
Los Angeles, CA 90025-1030
(408) 720-8300